

3/20/02

Before the Federal Communications FCC
Washington, D.C.

IN the matter of:

Schools and Libraries Universal Service CC Docket No. 02-02

Comments on Notice of Proposed Rule Making

Please consider my answers to the following questions.

Eligible Services

1) Should the SLD post an online list of specific pre-approved product or services that applicants could choose from on their 471?

Yes

- If so, how often would the list need to be updated?

Annually

- How would the FCC ensure that maintaining such a list would not inadvertently limit applicants' ability to take advantage of products and services newly introduced to the marketplace?

It's already limited but a list would help cut down on the time needed to do RFP, quotes and then find out the item is not eligible.

- How could applicants and vendors best provide input to the SLD on an ongoing basis regarding what specific products and services should be eligible?

Annual survey

- How would the SLD handle services and equipment that are eligible only if used in certain ways? Any item that helps get the Internet to students and staff should be an eligible expense (network cards, workstation-network software, etc.)

2) Should the FCC reconsider their narrow position on wireless technologies?

Yes!

3) Should voice mail become an eligible service?

Yes

6) Should to SLD continue with their 30% processing benchmark when reviewing funding requests that include both eligible and ineligible services?

Post Discount Process

4) Should applicants have the final decision whether to choose discounts or reimbursement?

Yes

5) Should entities be restricted from applying for internal connections for a certain number of years?

Yes!!!!!! Possibly a two or three year restriction after they receive internal connections.

Enforcement

6) Should the SLD/FCC be permitted to ban from the program certain applicants, service providers, and others that engage in willful or repeated failure to comply with program rules?

Yes

Unused Funds

7) What are the reasons for funding to go committed, yet unspent each year and what changes could be made to reduce this amount?

There is too long a time span between applying for the discount and finally getting it. Many schools have had to find alternative funding or the technology has changed so much you cannot get the items you contracted for.

8) What should be done with unused funds at the end of each funding year?

Put in with funding for the next year.

9) Should the FCC require expressly that unused funds be distributed to schools and libraries in subsequent years of the E-rate program, in excess of the annual \$2.25 billion cap (the thought being that unused funds in subsequent funding years would provide additional resources for applicants, thereby assisting efforts to provide affordable telecommunications and information services to schools and libraries)?

The money should be used for it's intended purposes and given to the schools and libraries.

10) What are some outmoded administrative or procedural E-rate rules or policies that could be eliminated?

A. Stop allowing 90% discounts for internal connections if they received funds the year before so those of us below 90% can benefit from internal connections also.

B. Apply for the discounts closer to the date of actual funding, it's hard to determine needs based on Nov-Dec one year and what you will actually get in July (if indeed it's July when you find out!!!)

Respectfully submitted,
Vickie Claybrook
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